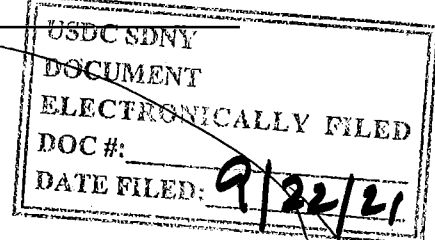




U.S. Department of Justice

United States Attorney  
Southern District of New York

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601



September 21, 2021

APPLICATION GRANTED  
SO ORDERED:

*VLB*  
Vincent L. Briccetti, U.S.D.J.

Dated: 9/22/21

White Plains, NY

*Government's opposition to Brown's motion is due 10/15/21. Government's opposition to Rainey's motion remains due 9/24/21.*

**BY EMAIL & ECF**

The Honorable Vincent Briccetti  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Frank Brown, a/k/a "Nitty," et al., S1 20 Cr. 444 (VB)

Dear Judge Briccetti:

The Government respectfully writes regarding defendant Frank Brown's suppression motion dated August 25, 2021. (See Docket Entries 113-17). The Government's current deadline to respond to the motion is September 24, 2021. The next pretrial conference before the Court is currently scheduled for October 21, 2021.

The Government is in active plea negotiations with Mr. Gold, counsel to Mr. Brown, and the parties are hopeful that they will be able to reach a resolution of this matter in the coming weeks. Accordingly, the Government respectfully requests an additional three weeks—until October 15, 2021—to respond to the defendant's motion. The Government intends to respond to defendant Pedro Rainey's suppression motion by the original deadline of September 24, 2021, unless the Court would prefer to keep both motions on the same track. (Docket Entry 118).

Very truly yours,

AUDREY STRAUSS  
Acting United States Attorney

by: *[Signature]*

Benjamin A. Gianforti  
Assistant United States Attorney  
(646) 856-5190

cc: Ben Gold, Esq., counsel to Frank Brown (by ECF & email)  
Larry Sheehan, Esq., counsel to Pedro Rainey (by ECF & email)  
Daniel Parker, Esq., counsel to Joseph Scott (by ECF & email)  
Frank O'Reilly, Esq., counsel to Tonya Brown (by ECF & email)  
Sam Braverman, Esq. counsel to Keith Glover (by ECF & email)